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VIA ECF

Magistrate Judge Anne Y. Shields
United States District Court
Eastern District of New York
100 Federal Plaza
Central Islip, New York,

Re: Stanley Park Tenants' Association, et. al. v. Fair Housing et. al
15-cv-6225 (JS)(AYS)

Dear Judge Shields,

I represent the defendants Fair Housing Development Fund Corp., Dr. Bruce McCurty, Rev. Clarence Johnson, Rev. Alfred Evans, the Stanan Group, Stanley Wilczewski, Greg Piperno, and James Middleton ("Defendants") in this matter. I write on behalf of Defendants who request that a briefing schedule be set for them to move for summary judgment pursuant to FRCP 56.

To the extent any discovery remains outstanding it should be ordered to be completed, but discovery is complete from Defendants' perspective. The sole unresolved issue at this point appears to be a pending motion made by plaintiff, Danielle Willis, for the appointment of counsel for the Stanley Park Tenants' Association so it can proceed *in forma pauperis*. Dk. No. 95. Defendants note, however, that, based on information learned during discovery, the Stanley Park Tenants' Association is not a corporate entity, or legal entity of any kind, and thus lacks standing to bring suit.

Defendants additionally note that there is urgency underlying their request due to the financial condition of Fair Housing Development Fund Corp., which needs to raise rents at Stanley Park Houses, where plaintiffs Danielle Willis and Caroline Rafenski currently live or once lived. Costs have increased primarily in the form of increased insurance premiums as a direct result of the filing of this lawsuit. Given that the plaintiffs have characterized the potential of raising rent as retaliatory, the Fair Housing Development Fund Corp. requires resolution of the issue. Defendants continue to suffer prejudice while this action remains pending.

I thank the Court for its consideration of this request.

Respectfully submitted,

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